

EXHIBIT B

11/6/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Joelle Pineau

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE MATTER OF:)
RICHARD KADREY, et al.,)
Plaintiff,)
vs.) C.A. NO.:
META PLATFORMS, INC.,) 3:23-cv-03417-VC
Defendant.)

** HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY **

VIDEOTAPED DEPOSITION OF JOELLE PINEAU
Montreal, Quebec, Canada
Wednesday, November 6, 2024

Stenographically Reported by:
ANGELA JANSSEN, CSR,
Commissioner of Oaths

DIGITAL EVIDENCE GROUP
1730 M Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

11/6/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Joelle Pineau

Page 70

1 probably come up with an answer.

2 Q. Now LLaMA 1 was previously known
3 as Genesis, right?

4 MS. HARTNETT: Objection to form.

5 A. We used that name internally for
6 a short period, yes.

7 BY MR. YOUNG

8 Q. And eventually the decision was
9 made to release the model as LLaMA as opposed to
10 Genesis, right?

11 MS. HARTNETT: Objection to form.

12 A. Yes.

13 BY MR. YOUNG

14 Q. Was it due to association with a
15 crypto platform released by the Winklevoss twins
16 that was undergoing SEC investigation around that
17 time?

18 MS. HARTNETT: Objection to form.

19 A. I don't remember that being a
20 deciding factor in the name.

21 BY MR. YOUNG

22 Q. Okay.

11/6/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Joelle Pineau

Page 71

1 A. LLaMA is just a better name.

2 Q. Not everyone at Meta agreed with
3 you though?

4 A. I'm well aware.

5 Q. Now, when LLaMA 1 was released,
6 it was released -- well, before we get to that.

7 Do you recall when this lawsuit
8 was first filed against Meta?

9 MS. HARTNETT: Objection to form.

10 A. You mentioned it earlier, but I
11 don't remember exactly. Summer of 2023?

12 BY MR. YOUNG

13 Q. Do you know what the term "shadow
14 library" means?

15 A. No.

16 Q. Have you ever heard of dataset
17 known as Library Genesis or LibGen?

18 A. LibGen rings a bell, but I don't
19 know the specifics.

20 Q. What about Sci-Hub? Have you
21 heard of a dataset known as Sci-Hub?

22 A. Sci-Hub, no.

11/6/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential - Attorneys' Eyes Only

Joelle Pineau

Page 366

1 Q. Do you recall if Dr. Presani ever
2 expressed concerns about the use of pirated
3 datasets to others in FAIR to train Generative AI
4 models?

5 MS. HARTNETT: Objection to the form.

6 A. I don't remember Dr. Presani
7 expressing concerns about the use of specific
8 datasets in training models.

9 BY MR. YOUNG

10 Q. Do you remember if Dr. Presani
11 ever expressed to you the concerns about using
12 LibGen to train Generative AI models at Meta?

13 MS. HARTNETT: Objection to the form.

14 A. I don't remember them expressing
15 concern about that.

16 BY MR. YOUNG

17 Q. Have you ever used with WhatsApp
18 to discuss details about datasets used to train
19 Generative AI models at Meta?

20 A. I don't remember using WhatsApp
21 to discuss this with anyone.

22 Q. Have you ever used WhatsApp to